

UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF TEXAS  
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DIVISION

**Civil Complaint  
FILED**

December 07, 2021

CLERK, U.S. DISTRICT COURT  
WESTERN DISTRICT OF TEXAS

BY: lad  
DEPUTY

Jason Kim Manners  
Plaintiff(s)

CASE NUMBER: 6:21cv1272  
(Supplied by Clerk's Office)

Gregory Joseph Pence  
Defendant(s)

**COMPLAINT**

NOW COMES Jason Kim Manners, Plaintiff Pro Se, individually complaining of Defendant, Gregory Joseph Pence, for cause that would show the Honorable Court as follows in Section III. Allegations to the best of the Plaintiff's knowledge.

**SECTION I. PLAINTIFF AND DEFENDANT'S INFO**

The Plaintiff Pro Se, Jason Kim Manners, has the following mailing address which is also his residential address: 2114 Addax Trail, Harker Heights, Texas 76548.

The Defendant, Gregory Joseph Pence, has the following mailing addresses which are also his Congressional Offices due the Plaintiff not knowing the Defendant's residential address at the time of filing this civil complaint:

1. 529 Washington Street, Columbus, Indiana 47201
2. 211 Cannon House Office Building, Washington, District of Columbia 20515

## **SECTION II. JURISDICTION**

Jurisdiction exists in this court pursuant to 28 U.S. Code § 1332 and 18 U.S. Code § 798 as this action is brought under Federal Statutory Action and Diversity of Citizenship.

## **SECTION III. ALLEGATIONS**

- I. The Plaintiff alleges that the Defendant, Gregory Joseph Pence, violated 18 U.S. Code § 798 Subsection (a) by knowingly and willfully disclosing, with the Plaintiff, who is an unauthorized individual under 18 U.S. Code § 798 Subsection (b), classified information obtained by the Defendant during a Congressional “closed door” testimony, and the Defendant also disclosed the name of the testifier who was at that time an United States Department of State official.
- II. The Plaintiff also alleges that while violating the 18 U.S. Code § 798 mentioned in Section I by disclosing to the Plaintiff unrequested classified information, the Defendant has caused the Plaintiff to be in an insecure situation and added tremendous responsibility to the Plaintiff, who at the time was only Sixteen years of age, due the nature of the information that was disclosed.
- III. The Plaintiff also alleges that the Defendant has also put the national security of the United States of America in jeopardy due to the disclosure of this classified information and raising the potential of disclosing more U.S. Federal classified information.

### **SECTION III-A. FACTS**

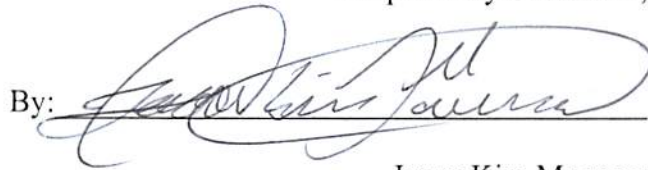
1. On Friday April 5, 2019, the Plaintiff, Jason Kim Manners, met with the Defendant, Gregory Joseph Pence, at the Defendant's Congressional office in Columbus, Indiana prior to closing hours. Two staff members of the Defendant, whose names the Plaintiff currently does not remember, were present at the meeting and the Plaintiff's grandfather, Carl Lee Manners, was present as well. The Plaintiff's mother, Ok Soon Manners, and father, Jason Lee Manners, were made aware of the meeting prior to April 5, 2019. The meeting took place at the front entrance desk area of the office and both the Plaintiff and Defendant stayed in the room for the duration of the meeting.
2. Earlier in the week, the meeting was originally scheduled for the Plaintiff and his grandfather to meet with a staff member of the Defendant, due to the Defendant being unavailable on the 5th of April, 2019. However upon arriving at the Defendant's office, the Plaintiff and his grandfather were both introduced to the Defendant and the meeting proceeded.
3. From approximately November 13, 2018 to April 18, 2019, the Plaintiff was a constituent of the Defendant and had a mailing and residential address of 919 Moss Oak Ct, North Vernon, Indiana 47265 and can be confirmed by the White House Correspondence Team and the State Department's Correspondence Team as well. The mentioned Plaintiff's grandfather, Carl Lee Manners, was then and currently is a constituent of the Defendant and resides in the City of North Vernon. Additional information that the Plaintiff is able to provide, will be provided if ordered by the Court.

#### SECTION IV. RELIEF REQUESTED

I, the Plaintiff, am seeking no personal gain or relief in monetary value given to me. I am only seeking justice and pray that the Defendant be charged and punished with applicable law, including but not limited to the maximum punishment stated in United States Code Title 18 Part I Chapter 37 § 798 Subsection (a). I am also requesting that — if proven that the Defendant has willfully and/or knowingly caused harm against the national security of the United States — that the defendant be held accountable for treason against the United States of America. This is the Relief that I seek as Plaintiff Pro Se.

Respectfully Submitted,

By:



Jason Kim Manners

Plaintiff Pro Se

2114 Addax Trail

Harker Heights, Texas 76548

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Filing Date: 12/07/2021